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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

IN RE:

CASE NO.: 10-60181

**OCCUPATIONAL & MEDICAL
INNOVATIONS LIMITED**

CHAPTER 15

DEBTOR

**REPLY TO OBJECTION FILED BY RETRACTABLE
TECHNOLOGIES, INC.**

NOW INTO COURT, through the undersigned counsel and through its duly designated administrators, David Michael Stimpson and Terrence John Rose of SV Partners, Insolvency Accountants and Business Solutions of Brisbane, Australia, comes Occupational & Medical Innovations, Ltd. (“OMI”), who respectfully move the court for an emergency hearing on their previously filed motion for provisional relief pursuant to 11 U.S.C. § 1519, and respectfully represents as follows:

1.

Retractable Technologies, Inc.’s (“RTI”) Objection is untrue in its claims of gamesmanship.

2.

The undersigned counsel made and offer to counsel for RTI for the entry of a preliminary injunction in the substance of the permanent injunction RTI seeks in the pending patent litigation.

3.

The administrators simply seek the maintenance of the *status quo* pending “Proposal for a Deed of Company Arrangement from AssistMed (Australia) Pty., Ltd.

WHEREFORE, Occupational & Medical Innovations, Ltd., and its duly appointed administrators pray that this Honorable Court enter an order pursuant to 11 U.S.C. § 1519, extending the automatic stay pursuant to 11 U.S.C. § 362 of the Bankruptcy Code to the foreign debtors Chapter 15 case, and specifically staying any further proceedings in Retractable Technologies, Inc. v. Occupational & Medical Innovations, Ltd., Civil Action No. 6: 08-cv-00120, pending in the United States District Court for the Eastern District of Texas, Tyler Division, pending this court’s hearing on March 18, 2010, at 2:00 o’clock p.m. to determine whether or not this court will recognize the insolvency proceedings of Occupational & Medical Innovations, Ltd., and for such other and further relief as is justified in the premises.

Alexandria, Louisiana, this 2nd day of March, 2010.

Respectfully submitted:

GOLD, WEEMS, BRUSER, SUES & RUNDELL

By: /s/Bradley L. Drell
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**ATTORNEYS FOR OCCUPATIONAL &
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing **REPLY TO OBJECTION FILED**
BY RETRACTABLE TECHNOLOGIES, INC. has been Patrick Kelley (via email:
patkelly@icklaw.com) on this 2nd day of March, 2010.

/s/Bradley L. Drell

OF COUNSEL